



November 7, 2024

The Honorable Richard M. Gergel  
United States District Judge  
District of South Carolina

Subject: *In Re: AFFF Products Liability Litigation*, MDL No. 2873

Dear Judge Gergel,

I hope this letter finds you well. I am writing to express my gratitude for the opportunity to serve as co-lead counsel in the Aqueous Film-Forming Foam (AFFF) MDL No. 2873, a role I have held for the past five years. The privilege of participating in this critical litigation has been deeply meaningful, and I am proud of the strides our team has made under the Court's guidance.

After a period of thoughtful reflection, I have concluded that, at this stage in my life, I wish to dedicate more time to my family and adjust my professional commitments accordingly. Balancing these responsibilities is essential for me, and I believe that stepping down from my current role will allow me to achieve that balance.

While I am stepping away, I want to emphasize that over 124 dedicated staff members in our office have been working diligently on this matter. I would like to acknowledge their hard work and express my hope that the Court will allow them to continue contributing to these cases. Three Partners and a team of lawyers and support staff have played an instrumental role in recent settlements, including the Kidde Bankruptcy Unsecured Creditors Committee. In addition, many have been serving alongside with and as a Co-Chair of the Personal Injury track. I understand that the PEC positions are individual appointments, and I respectfully ask the Court to consider our office in some role.

Our firm represents a substantial number of pending cases in the MDL, including water providers, municipalities and individuals, and we have been integrally involved in the settlement teams on personal injury matters, as well as on the allocation committee in Kidde. Additionally, we are responsible for overseeing U.S. discovery and coordination, leading the CERCLA task force, and have spearheaded the FTCA and 113(h) briefing and arguments, among other major roles too numerous to list.

I am committed to ensuring a smooth transition for the team and will support any efforts needed to maintain continuity and progress in the litigation. Thank you for your understanding and for the trust you have placed in me over the years. I look forward to witnessing the continued success of this MDL and the valuable impact it will have.



Sincerely,

/S/

Paul J. Napoli

cc: Plaintiff and Defense Co-leads